

FILED

COMPLAINT FORM

(for filers who are prisoners without lawyers)

MAR 25 2020

US DISTRICT COURT
NEW ALBANY DIVISION

IN THE UNITED STATES DISTRICT COURT

FOR THE Southern DISTRICT OF Indiana

(Full name of plaintiff(s))

Braidan C. Coy

vs

Case Number:

(Full name of defendant(s))

4 : 20-CV- 072 SEB -DML

(to be supplied by clerk of court)

William A. Gray

Justin Brown

Christopher Blake Lane

Susan Orth

A. PARTIES

1. Plaintiff is a citizen of Indiana, and is located at

(State)

Wabash Valley Correctional Facility, P.O. BOX 1111
Carlisle, IN 47838-1111
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant William A. Gray
(Name)

A. Parties

2. Defendant Justin Brown is a citizen of Indiana and resides at 311 Hauss Square, New Albany, IN and worked for N/A

Defendant Christopher Blake Lane is a citizen of Indiana and resides at 311 Hauss Square, New Albany, IN and worked for Floyd County Prosecutors Office, 311 Hauss Square, New Albany, IN

Defendant Susan Orth is a citizen of Indiana and resides at 311 Hauss Square, New Albany, IN and worked for N/A

is (if a person or private corporation) a citizen of Indiana

(State, if known)

and (if a person) resides at 224 East Court Avenue Jeffersonville, IN 47130

(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for ^{Public Defender} William A. Gray Attorney At Law ²²⁴ East Court Avenue Jeffersonville, IN ⁴⁷¹³⁰
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

On the dates of December 9,
~~2019~~ ²⁰¹⁴ through December 12, ~~2019~~ ²⁰¹⁴, the said
defendants William Gray, Chris Lane,
Justin Brown; and Susan Orth violated
several of my U.S. Constitutional Rights
in the Floyd County Superior Court I
for corrupt reasoning I am unfortunately
unaware of. The following right are
what I feel like these said defendants
violated:

1. During the process of jury selection, one of the jurors spoke aloud in the presence of other jurors, of a prejudice newspaper article one had seen, therefore contaminating the entire court of this said article.

I feel like William Gray, Chris Lane, Justin Brown, and Susan Orth violated my; 5th right: Due Process, 6th right: Right to Impartial Jury and Effective assistance of Counsel, 9th right: The enumeration in the constitution of certain Rights, and my 14th right: Due Process on the Law and Equal Protection on the Laws; rights due to the fact that the jury was not struck, therefore continuing trial with a contaminated jury, ~~and~~ further substantially damaging my credibility and defense case. → continued

2. During the whole process of trial, ~~the~~ I was given 3-4 hours for jury selection, the jury was not presented with all of the evidence, particularly in my favor for self-defense, or given the motion for ~~discovery~~ discovery, which contained said evidence in my favor, there were fully uniformed police officers and EMT's ^{which} took the witness stand, and during closing arguments, William Gray presented multiple theories. I feel like William Gray, Chris Lane, Justin Brown, and Susan Orth violated my; 5th right: Due process, 6th right: Right to Impartial Jury and Effective Assistance of Counsel, 9th right: The Enumeration in the Constitution of Certain Rights, and my 14th right: Due process on the Law and Equal Protection on the Laws; rights due to the fact that 3-4 hours is obviously not a substantial amount of time to ~~to~~ properly screen, get acquainted with, or develop a relationship with the jury and William Gray shouldn't have forced me to rush through it, the Motion for Discovery had evidence important enough that it should have been presented and would have substantially increased my chances of my self-defense plea, the fully uniformed officers and EMT's were not struck from the stand as credible witnesses, their uniforms ~~creating~~ creating an aura → Back

3. ~~Q.~~ During the prosecution's presentation, they were able to call all of their witnesses and present all of their evidence, but when it came time to call two of my key and most important witnesses, being Haley Marship and Destiny Garrett, they were struck from the court and were not able to testify in my favor. I feel like William Gray, Chris Lane, Justin Brown, and Susan Orth violated my; 5th right: Due Process, 6th right: Compulsory Process for obtaining witness in my favor and effective assistance of counsel, 9th right: The Enumeration in the constitution of certain right, and my 14th right: Due Process on the Law and Equal Protection on the laws; rights due to the fact that my most important witnesses were struck ~~with~~ no lawfully pure reasoning and were not able to testify on my behalf, therefore leading to ~~was~~ this unfortunate demise.

On the date of January 6, 2020 at approximately 5:55 p.m. at Floyd County Jail, I recieved a visit from my father, Jamie Loy, who informed me that during trial after my two key witnesses were struck from court as witnesses, my father asked William Gray why ~~the~~^{my} witnesses were struck, considering they were of utmost importance to my self defense case, that William Gray told him they were struck because, "the court was scared of what they were going to say upon taking the witness stand."

This gives me reason to believe and suspect that William Gray, Chris Lane, Justin Brown, and Susan Orth knowingly and intentionally violated my constitutional rights for some corrupt reasoning I am unfortunately unaware of.

This is why I believe my case belongs in a federal court and the reasons for why I am suing these said defendants.

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.
OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

For the violations of ~~constitutional~~ my
~~rights~~ constitutional rights as an American
citizen of the U.S., the prejudice newspaper
articles and stories, my image getting down-
graded as a human being, the money I
lost fighting this case, the family members
I've lost during this time, the stress caused
from this case, the pain and suffering
I've gone through while fighting this case, and
the physical damages and effects obtained
since first getting incarcerated, I am requesting
\$¹⁰~~0,000,000~~, my charge dropped, and release from
incarceration.

E. JURY DEMAND

☒ Jury Demand - I want a jury to hear my case
OR

☐ Court Trial - I want a judge to hear my case

Dated this 4th day of March 2020.

Respectfully Submitted,

B. Long
Signature of Plaintiff

278668
Plaintiff's Prisoner ID Number

Wabash Valley Correctional Facility
P.O. Box 1111 Carlisle, IN 47838-1111
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE

☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.